

# **EXHIBIT A**

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**From:** Lanier, Greg <tglanier@JonesDay.com>  
**Sent:** Friday, July 30, 2021 5:01 PM  
**To:** Jim Etheridge; Ryan Loveless; IPTeam; mark@waltfairpllc.com  
**Cc:** Jones (External), Mike; Stitt, Tracy A.; Mayergoyz, Sasha; Matt Warren  
**Subject:** RE: WSOU/Google

Jim,

I hope you are enjoying the summer. I write to follow up on our correspondence below, our emails of June 17 and 24, and our related phone conversations, relating to disposition of claims that the Court held indefinite in its *Markman* Order on June 17. We still have not heard from you on this issue after our several conversations. We believe this is a straightforward issue that should be addressed easily and efficiently. Google thus requests that WSOU stipulate to a dismissal with prejudice of the indefinite claims, or confirm that it will not oppose motions for summary judgment of invalidity for the following claims that the Court held indefinite:

- Claims 1, 3-6, and 10-16 in the 581 case (all the asserted claims)
- Claims 1, 9, 16, and 24 in the 582 case (all the asserted claims)
- Claims 1-17 in the 574 case
- Claims 9-16 in the 577 case
- Claims 1, 2, and 12 in the 578 case

Please let me know by August 6 if this is agreeable to WSOU. If we do not hear from you by August 6 that WSOU agrees to a dismissal with prejudice or unopposed motions for summary judgment, Google will then promptly file summary judgment motions in the above-identified cases and seek fees and costs associated with such motions.

Thanks,

Greg

Tharan Gregory Lanier  
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**From:** Lanier, Greg  
**Sent:** Wednesday, June 30, 2021 4:41 PM  
**To:** Jim Etheridge <jim@etheridgelaw.com>; Ryan Loveless <ryan@etheridgelaw.com>; IPTeam <IPTeam@etheridgelaw.com>; 'mark@waltfairpllc.com' <mark@waltfairpllc.com>  
**Cc:** Jones (External), Mike <mikejones@potterminton.com>; Stitt, Tracy A. <tastitt@jonesday.com>; Sasha Mayergoyz <smayergoyz@JonesDay.com> <smayergoyz@JonesDay.com>; Matt Warren <matt@warrenlex.com>  
**Subject:** WSOU/Google

Jim,

I hope you had a good trip. I write to follow up on the conversation we had in mid-June (and our subsequent emails) regarding the appropriate mechanism for dismissing: (i) the 581 and 582 cases in which all the asserted claims were held to be indefinite; and (ii) at least the specific claims held indefinite in the 574 case (claims 1-17), the 577 case (claims 9-16), and the 578 case (claims 1, 2, and 12). This seems like an issue on which the parties should be able to reach a straightforward agreement on dismissal with prejudice. Please let me know if you have heard back from your client.

Thanks, and I wish you and all a happy and safe 4<sup>th</sup>.

Greg

Tharan Gregory Lanier

Partner

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